

FOR AGENDA

*Cassandra: FYI*



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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL ENVIRONMENTAL SATELLITE, DATA,  
AND INFORMATION SERVICE

Washington, D.C. 20233  
Office of Radio Frequency Management  
Room 2246, SSMC-2  
1325 East West Highway  
Silver Spring, MD 20910

*IB 96-220*

*H. Ng.*  
*Comments?*  
*Fred*

April 21, 1997

Mr. Norbert Schroeder  
Acting Chairman, IRAC  
National Telecommunications  
and Information Administration  
U.S. Department of Commerce  
Washington, D.C. 20230

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**MAY 27 1997**

Federal Communications Commission  
Office of Secretary

Dear Mr. Schroeder,

NOAA and the Defense Agencies have reviewed the proposals put forward by second round Little LEO applicants in the wake of the FCC's NPRM on timesharing of the metsat bands at 137, 148 and 400 MHZ. We recognize the urgency with which the Commission views the matter of locating additional spectrum for the MSS, but as operators and users of existing metsat systems, we are greatly concerned that precipitous action may damage critical national assets. We are therefore taking this opportunity to bring our concerns to your attention.

Since the inception of Little LEOs, NOAA and the DOD have been cooperators in the development of the industry. Its first spectrum came from bands allocated to meteorological satellites (137, 400 MHZ bands) and military systems (148 MHZ bands). The progress made by the industry to date has been the result of careful planning and negotiated agreements which have minimized potential disruption to existing systems while allowing the MSS industry to be born. We now find these carefully drawn agreements under attack.

First, we note the absence of any international acceptance of the time sharing approach being promoted by industry. When first introduced into ITU-R (Working Party 7C, Geneva) it was summarily rejected for lack of any supporting studies. These studies remain undone and none are known to be in progress, so it is unlikely that WP7C will reach any different conclusions in the near future. Needless to say, there is no experimental evidence supporting the feasibility of time sharing.

The concept is being promoted entirely by those having no existing systems at risk and no reason for caution, and who cannot agree among themselves on sharing arrangements.

We note as well that the rationale originally presented in support of time sharing of the metsat bands was approved on the basis of limited use. Though uncomfortable with the idea, we continued the discussion on the basis of sharing with a single MSS system. Now, however, we find ourselves faced with the prospect of having to share the spectrum with a multiplicity of commercial systems in a variety of orbits, with different modulation schemes and under the



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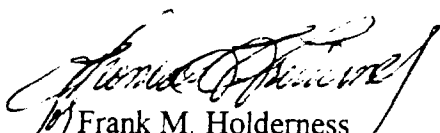
control of competitive and potentially uncoordinated entities. This greatly exceeds the parameters to which we previously agreed, and even those of our recent discussions on timesharing.


Moreover, the agreements we originally made during 1992 negotiations concerning the 137-138 MHz band have imposed changes and restrictions on the operation of our systems. NOAA has agreed to move its future polar satellites from existing frequencies in the band to the so-called "NOAA bands," regions near the ends of the band where the MSS would be secondary. This was done with the understanding that metsats would have unencumbered use of these bands, necessary since NOAA's satellites will not be the only ones using them. Reaching these agreements involved a great deal of time and effort. To implement them is taking, in addition, a considerable amount of money for the redesign of satellites and ground station equipment. We therefore expect that the agreements originally made will now be honored by the industry. To encumber the NOAA bands with a multiplicity of commercial networks is to renege on the intent of the original agreements, making it difficult or impossible for metsats to use them in the manner that formed the basis for their creation.


The same sort of comment pertains to industry proposals for multiple MSS systems to timeshare the 400.15-401 MHz band shortly to be used by military metsats, part of the Defense Meteorological Satellite Program (DMSP). NOAA and the DoD agencies were willing to accept the risks associated with timesharing with a single commercial system, but given the absence of any proof that the technique works, are unwilling to accept the much larger risks inherent in sharing with a multiplicity of MSS networks.

To lose effective use of these bands will increase risks to U.S. military forces worldwide, as well to emergency managers and others who depend on metsat data for weather forecasting, storm tracking, and disaster recovery. We urge NTIA to do its utmost to prevent the irrecoverable damage that could result from the unconsidered licensing of more commercial systems than technology and the spectrum will support.

Sincerely,

  
Frank M. Holderness  
Army Representative

  
Bruce Swearingen  
Navy Representative

  
Nelson Pollack  
Air Force Representative

  
Richard Barth  
Commerce Representative